

**THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

Taylor D. Pendleton,

Plaintiff,

v.

10Q LLC *et al.*,

Defendants.

Case No. 1:23-cv-04708

Dist. Judge Andrea R. Wood

Mag. Judge M. David Weisman

**DECLARATION OF EDUARDO MARTORELL, ESQ.**

I, Eduardo Martorell, of the City of Los Angeles, in the State of California, declare as follows:

1. I am an attorney admitted to practice before all California state courts and all California District Courts, including the U.S. District Court for the Central District of California. I am in good standing in each of these courts and have never been subject to professional disciplinary proceedings of any kind.

2. This Declaration is submitted to supplement the Motion to Vacate Entry of Default filed by Defendants Propelr Music, LLC (“Propelr”) and Marriani, Inc. (“Marriani”). Except where expressly stated otherwise, I have personal knowledge of the following facts and, if called as a witness, I could and would competently testify to the assertions contained in this Declaration.

3. I represented Defendants Propelr and Marriani in the Plaintiff’s suit against the Defendants in the U.S. District Court for the Central District of California (hereinafter, the “California Action”). The Plaintiff, Taylor D. Pendleton, was represented by Andrew Williams, Esq. of The Williams Group (hereinafter, “Williams”) and Kristina T. Wilson, Esq. of The Law Offices of Kristina T. Wilson P.C (hereinafter, “Wilson”).

4. Throughout the course of the California Action, Wilson and Williams were aware that I represented the Defendants, and we had numerous communications regarding Plaintiff's suit against the Defendants.

5. In these communications, neither Wilson nor Williams requested a waiver of service or acceptance of service on behalf of the Defendants through me in connection with the Plaintiff's suit against any of the Defendants in the U.S. District Court for the Northern District of Illinois to the best of my recollection.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on June 28, 2024, at Los Angeles, California

  
\_\_\_\_\_  
Eduardo Martorell